

REQUIRED STATEMENT**TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**All Cases: Debtor(s) Wylie S Rogers Leah J Rogers Case No. 16-20862 Chapter 13All Cases: Moving Creditor WELLS FARGO BANK, N.A. Date Case Filed 6/27/16Nature of Relief
Sought:☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____Chapter 13: Date of Confirmation Hearing 08/11/2016 or Date Plan Confirmed _____Chapter 7: ☐ No-Asset Report Filed on _____
☐ No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral

- a. ☒ Home
- b. ☐ Car Year, Make, and Model _____
- c. ☐ Other (describe) _____

2. Balance Owed as of Petition Date \$82,667.11

Total of all other Liens against Collateral \$.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$21,535.00, per Debtor's Schedules

5. Default

- a. ☒ Pre-Petition Default as of petition date
- Number of months 1 Amount \$1,503.95
- b. ☐ Post-Petition Default
- i. ☐ On direct payments to the moving creditor
- Number of months _____ Amount _____
- ii. ☐ On payments to the Standing Chapter 13 Trustee
- Number of months _____ Amount _____

6. Other Allegations

- a. ☐ Lack of Adequate Protection § 362(d)(1)
- i. ☐ No insurance
- ii. ☐ Taxes unpaid Amount \$ _____
- iii. ☐ Rapidly depreciating asset
- iv. ☐ Other (describe) _____
- b. ☐ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
- c. ☒ Other "Cause" § 362(d)(1)
- i. ☐ Bad Faith (describe) _____
- ii. ☐ Multiple Filings
- iii. ☒ Other (describe) Property to be Surrendered.
- d. Debtor's Statement of Intention regarding the Collateral
- i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☒ No Statement of Intention Filed

Date: August 10, 2016/s/ Peter C. Bastianen
Counsel for Movant